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U S NAVY RESPONSES TO REGULATOR COMMENTS REGARDING DRAFT TECHNICAL MEMORANDUM FOR NO FURTHER ACTION AT SOLID WASTE MANAGEMENT UNITS 7 AND 8 NAS FORT WORTH TX
11/19/1999
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

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NAVAL AIR STATION FORT WORTH JRB CARSWELL FIELD TEXAS

ADMINISTRATIVE RECORD COVER SHEET

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492

RESPONSES TO COMMENTS: DRAFT TECHNICAL MEMORANDUM RECOMMENDATION FOR NO FURTHER ACTION AT SWMU 7 AND SWMU 8 NAS FORT WORTH JRB, TEXAS

Responses to Ray Risner's (TNRCC) Comments

(As faxed on November 19, 1999)

Comment 1 *Why only two borings for two SWMUs? Address the placement of the borings.*

Response Solid waste management unit (SWMU) 7 was investigated during the 1997 sanitary sewer investigation. During this investigation two soil borings were advanced, one on each side of SWMU 7 and groundwater samples were collected from monitoring well WITCTA008. Had the initial sample results shown evidence of release to the soil or groundwater at the site, additional delineation borings would have been advanced at the site. As SWMU 7 is only about 25 feet long, the initial two soil borings and the groundwater samples provide ample coverage of the site to support the conclusion that there has not been a release to the environment from this SWMU.

Although no soil investigation was conducted in the area directly adjacent to SWMU 8, the SWMU possessed adequate secondary containment features in compliance with permit requirements. In addition, the underground storage tank (UST) and all of its associated piping has consistently passed monthly tightness testing since 1994. Additional groundwater sample results from monitoring wells LSA1628-14 and LSA1628-15 have been added to the Final Closure Report to support the conclusion that there has not been a release to the environment from SWMU 8. Had the groundwater sample results shown evidence of a release from SWMU 8, a soil investigation would have been conducted.

Comment 2 *Why were only four samples collected from the borings at SWMU 7?*

Response Soil samples were collected at 5-foot intervals from the ground surface to the top of the water table during the investigation of the sanitary sewer system in 1999. The water table in the area of SWMU 7 is located at approximately 10 feet below ground surface (bgs). As a result, soil samples were collected from borings SB162801 and SB162802 at the 0- to 2-foot and the 6- to 8-foot intervals.

Comment 3 *No deeper samples? Silver and manganese were detected in the 6- to 8-foot interval of boring SB162802. Address detections of manganese in groundwater. Was silver not tested in groundwater?*

Response **See response to Comment 2 in explanation of the sample depth.**

Although manganese was detected above background in the 6-8-foot interval of boring SB162802, this concentration was only slightly above background and was not found in any of the other soil samples collected at the site. This isolated detection of manganese does not appear to be associated with a release at the site, but is more indicative of an extreme background concentration.

Concentrations of manganese were detected above background in the groundwater sample collected from the upgradient monitoring well LSA1628-3, but below background in the groundwater sample collected from downgradient monitoring well WITCTA008 (Table 2.4). These detections of manganese in the groundwater further reinforce the conclusion that the concentration of manganese above background in the soil sample collected from upgradient boring SB162802 is not indicative of a release from SWMU 7.

Although low concentrations of silver were detected in the surface soil sampled from boring SB162801 and in the subsurface soil sampled from SB162802, these detections are well below the Risk Reduction Standard (RRS) 2 Medium-specific concentration (MSC) and are considered to be more in line with background than with a release. In addition, silver is not a waste associated with operations within Building 1628, the Aerospace Ground Equipment (AGE) shop.

Groundwater samples collected from upgradient well LSA1628-3 and downgradient well WITCTA008 were analyzed for RCRA metals by EPA Method SW6010. Silver was included in the list of analytes at the site, but was not detected above the reporting limits in the groundwater sampled from either well.

Comment 4 *Why not RRS-2 for silver?*

Response **See response to Comment 3 for silver.**

Comment 5 *Was silver not tested for in groundwater?*

Response **See response to Comment 3 for silver.**

Comment 6 *What is the depth to groundwater?*

Response **Groundwater was encountered at this site at approximately 10-feet bgs.**

Comment 7 *Why not 14 and 15 included in the report?*

Response **In order to provide additional information, 1998 groundwater sampling results from monitoring wells LSA1628-14 and LSA1628-15 have been included at Table 2.1 in the Final Closure Report to further confirm that there has been no release of petroleum related wastes from SWMU 7 or SWMU 8.**

It should be noted that although groundwater samples have been collected from monitoring wells LSA1628-14 and LSA1628-15 quarterly since 1998, the samples have been analyzed in accordance with the TNRCC PST program requirements as part of the groundwater monitoring/remediation program for leaking petroleum storage tank (LPST) site 106684 located upgradient of SWMUs 7 and 8. Monitoring well WITCTA008 was installed downgradient of both SWMUs 7 and 8 in 1997, and groundwater samples were analyzed in accordance with RCRA permit requirements. Groundwater results from well WITCTA008 in 1997 did not display contamination indicative of a release from SWMU 7 or 8. The data provides sufficient information to determine that there has not been a release of hazardous constituents from SWMU 7 or 8 prior to the base realignment on October 1, 1994.

Comment 8 *Why no metals tested in 14 and 15?*

Response **See response to Comment 7 for wells LSA1628-14 and LSA1628-15.**

Comment 9 *Why silver? What waste was managed in Building 1628? Was it RCRA?*

Response **See response to Comment 3 for silver, and response to Comment 15 for contaminants of concern (CoCs).**

Comment 10 *Will SWMUs 7 and 8 be closed or will they remain operational?*

Response **This Closure Report is intended to provide justification for removal of Air Force obligations for SWMUs 7 and 8 under the RCRA permit HW-50289. This Closure Report is presented to verify that there is no evidence or history of release from SWMU 7 or SWMU 8 while they operated under Air**

Force management prior to the base realignment on October 1, 1994. Following closure of these sites, SWMU 7 and 8 will continue to operate under the Navy Compliance Program.

Comment 11 *Were the sump and drain line from 1628 investigated? Are they operating?*

Response **The sump and drain line from Building 1628 were not included in the investigation of SWMU 7. The investigation was concentrated on determining whether there had been a release from the actual structure of the OWS, which was identified as SWMU 7. Had there been evidence of release to the soil or groundwater at the structure, additional delineation borings would have been advanced at the site. The sump and drain line from Building 1628 to SWMU 7 is currently operating under the Navy compliance program.**

Comment 12 *Address the drain from SWMU 7 to SWMU 8.*

Response **Figure 2.1 has been revised to show the connection from SWMU 7 to SWMU 8.**

Comment 13 *Address the drain from SWMU 7 to the sewer.*

Response **Figure 2.1 has been revised to show the primary outlet piping from SWMU 7 to the sanitary sewer system, as well as an additional overflow protection release pipe to the storm sewer system.**

Comment 14 *Were borings SB162801 and SB162802 tested for BTEX, VOCs, and SVOCs?*

Response **All soil samples collected from borings SB162801 and SB162802 were analyzed for RCRA metals/mercury (SW6010/7471), VOCs (SW8260), SVOCs (SW8270), and pesticides/PCBs (SW8080) (Section 2.3). The constituents for BTEX are included in method SW8260 for VOCs.**

Comment 15 *CoCs?*

Response **Section 1.2.3, Contaminants of Concern, has been added to the Final Closure Report. This section includes a discussion of the wastes managed in each SWMU and identifies the primary CoCs associated with these wastes. These CoCs and their associated analytical methods of detection have been included in the Final Closure Report as Table 1.1.**

Comment 16 *Was the groundwater sampled from WITCTA008 tested for BTEX?*

Response **Groundwater samples collected from WITCTA008 were tested for VOCs (SW8260), SVOCs (SW8270), and metals (SW6010/7470) (Section 2.3.3). The constituents for BTEX are included in method SW8260 for VOCs. Analytical results are presented in Table 2.4 of the Final Closure Report. In addition, groundwater sample results from the LPST site investigation have been included in the Final Closure Report which provides additional analytical results of BTEX, PAHs, and TPH in the groundwater both upgradient and downgradient of SWMUs 7 and 8.**

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